

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

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Consumer Protection Claims*

In re:

LTL MANAGEMENT LLC,

Debtor.¹

Case No.: 23-12825 (MBK)

Chapter: 11

Hon. Michael B. Kaplan

**THE AD HOC COMMITTEE OF STATES HOLDING CONSUMER PROTECTION
CLAIMS' STATEMENT OF ISSUES ON APPEAL AND COUNTER-DESIGNATION OF
ITEMS TO BE INCLUDED IN THE RECORD ON APPEAL AS TO DISMISSAL
OPINION AND ORDER**

The Ad Hoc Committee of States Holding Consumer Protection Claims (the “Ad Hoc Committee”), by and through its undersigned counsel, hereby submits, pursuant to Rule 8009 of the Federal Rules of Bankruptcy Procedure, the following statement of issues to be presented on appeal and counter-designation of items to be included in the record on appeal in connection with the above-captioned debtor’s (the “Debtor”) appeal² from the Bankruptcy Court’s July 28, 2023 *Memorandum Opinion* [Docket No. 1127] and the related August 11, 2023 *Order (I) Dismissing*

¹ The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

² On September 5, 2023, the Ad Hoc Committee of Supporting Counsel (the “AHCSC” and together with the Debtor, the “Appellants”) also filed a notice of appeal. See Docket No. 1306.

Debtor's Chapter 11 Petition Pursuant to 11 U.S.C. § 1112(b); (II) Establishing Procedures with Respect to Requests for Compensation; and (III) Granting Related Relief [Docket No. 1211].

STATEMENT OF ISSUES TO BE PRESENTED ON APPEAL

The Ad Hoc Committee respectfully joins in and incorporates as if fully set forth herein the Official Committee of Talc Claimants' (the "TCC") statement of issues to be presented on appeal as set forth in their *Statement of Issues on Appeal and Counter-Designation of Record* [Docket No. 1407].

COUNTER-DESIGNATION OF RECORD ON APPEAL

The Ad Hoc Committee respectfully joins in and incorporates as if fully set forth herein the TCC's Counter-Designation of the Record as set forth in the *Statement of Issues on Appeal and Counter-Designation of Record* [Docket No. 1407].

CERTIFICATION REGARDING TRANSCRIPTS

The Ad Hoc Committee hereby certifies to the Clerk of Court that it is not ordering any transcripts that are not already included in the record on appeal.

RESERVATION OF RIGHTS

The Ad Hoc Committee expressly reserves the right to withdraw, supplement, amend or modify this statement of issues on appeal and counter-designation of items to be included in the record. This filing is made expressly subject to, and without waiver of any and all rights, remedies, challenges, and objections.

Dated: September 21, 2023

WOMBLE BOND DICKINSON (US) LLP

/s/ Ericka F. Johnson

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